## UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

Vagish, LLC, doing business as Cambridge Plaza Hotel, and Va Va Vagish, LLC, doing business as Legends Lounge,

C/A No.: 3:13-cv-03161-TLW

Plaintiffs,

VS.

Seneca Specialty Insurance Company,

Defendant.

PLAINTIFFS' (UNOPPOSED) MOTION TO EXTEND TIME TO RESPOND TO DEFENDANT'S SUPPLEMENTAL MOTION FOR SUMMARY JUDGMENT

Pursuant to Local Civil Rule 6.01, Plaintiffs Vagish, LLC, doing business as Cambridge Plaza Hotel, and Va Vagish, LLC, doing business as Legends Lounge (collectively, Vagish) respectfully move the Court to extend the time to respond to Defendant Seneca Specialty Insurance Company's (Seneca's) supplemental motion for summary judgment. <u>See</u> Dkt. No. 140.

Seneca filed its supplemental motion on April 15, 2016—almost three month after the deadline for dispositive motions passed. See Dkt. Nos. 79 & 95 (setting the dispositive motion deadline as January 29, 2016). Vagish moved to strike the motion as untimely and Seneca filed a response in opposition. Dkt. Nos. 141 & 142.

Now, Vagish respectfully moves the Court to extend the deadline to file any response to Seneca's untimely motion for summary judgment by seven (7) days from the time the Court rules on Vagish's motion to strike. The Court should grant the relief sought here because if Vagish's motion to strike is granted, no response is necessary to this motion.

Prior to filing this motion, the undersigned conferred with Seneca's counsel who does not oppose the relief sought here.

[signature page follows]

Respectfully submitted by,

s/Richard A. Harpootlian

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ATTORNEYS FOR PLAINTIFFS

May 2, 2016 Columbia, South Carolina.